

SUPREME COURT
OF THE STATE OF WASHINGTON

TODD SHIPYARDS CORPORATION,

Appellant,

v.

EDWIN HERRING, for himself and as
Personal Representative of the Estate of
ROGER HERRING,

Respondent.

NO. 78774-3

STATEMENT OF
ADDITIONAL
AUTHORITIES

RECEIVED
SUPREME COURT
STATE OF WASHINGTON

2007 MAY 29 11:39

BY RONALD R. CARPENTER

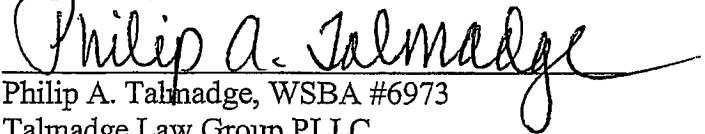
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COMES NOW the appellant Todd Shipyards Corporation and submits the following additional authorities to the Court pursuant to RAP 10.8:

- CP 49, 142-158 (publicity in Seattle media re: Todd bankruptcy filing in 1987);
- CP 112-116 (Herring did not file suit against Todd in 1989);
- CP 118-122 (Herring amended complaint to sue Todd in December 2003);
- CP 133-136, 335-338 (in answers to interrogatories, Herring never mentioned Todd as a place at which he worked);
- CP 210-211 (Bankruptcy court's March 8, 1988 order on notice identified parties who must receive actual notice);
- CP 194-204/*Williams v. Todd Shipyards Corp.* (Civil Action No. H-95-4592) (S.D. Tex. 1997) *affirmed* 154 F.3d 416 (5th Cir. 1998));
- 9/6/2006 N.Y.L.J.26 (Texas federal court finds that publication of bar date notice satisfied various asbestos claimants' right to due process as unknown creditors);
- *Stoll v. Gottlieb*, 305 U.S. 165, 59 S. Ct 134, 83 L.Ed.104 (1938) (where federal court determines a right under federal law, that decision is final unless set aside by the court that issued it or a higher court).

DATED this 23^d day of May, 2007.

Respectfully submitted,



Philip A. Talmadge, WSBA #6973
Talmadge Law Group PLLC
18010 Southcenter Parkway
Tukwila, WA 98188-4630
(206) 574-6661

Walter E. Barton, WSBA #26408
Karr Tuttle Campbell
1201 Third Avenue, Suite 2900
Seattle, WA 98101-3028
(206) 223-1313
Attorneys for Appellant Todd Shipyard Corporation

DECLARATION OF SERVICE

On this day said forth below, I deposited with the U.S. Postal Service a true and accurate copy of: Statement of Additional Authorities in Cause No. 78774-3 to the following parties:

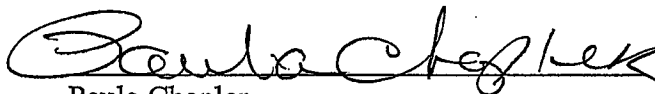
Walter E. Barton
Karr Tuttle Campbell
1201 Third Avenue, Ste 2900
Seattle, WA 98101-3028

William Rutzick
Janet L. Rice
Schroeter, Goldmark & Bender
810 Third Avenue, Suite 500
Seattle, WA 98104

Original sent by email for filing with:
Washington Supreme Court
Clerk's Office
415 12 St. W
Olympia, WA 98504-0929

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: May 23, 2007, at Tukwila, Washington.



Paula Chapler
Legal Assistant
Talmadge Law Group PLLC